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Medical Center, O'Connor Hospital, and Saint
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UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION

In re

VERITY HEALTH SYSTEM OF
CALIFORNIA, INC., *et al.*,

Debtors and Debtors in Possession.

- ☐ Affects All Debtors
- ☐ Affects Verity Health System of California, Inc.
- ☒ Affects O'Connor Hospital
- ☒ Affects Saint Louise Regional Hospital
- ☐ Affects St. Francis Medical Center
- ☒ Affects St. Vincent Medical Center
- ☒ Affects Seton Medical Center
- ☐ Affects O'Connor Hospital Foundation
- ☐ Affects Saint Louise Regional Hospital Foundation
- ☐ Affects St. Francis Medical Center of Lynwood Foundation
- ☐ Affects St. Vincent Foundation
- ☐ Affects St. Vincent Dialysis Center, Inc.
- ☐ Affects Seton Medical Center Foundation
- ☐ Affects Verity Business Services
- ☐ Affects Verity Medical Foundation
- ☐ Affects Verity Holdings, LLC
- ☐ Affects De Paul Ventures, LLC
- ☐ Affects De Paul Ventures - San Jose Dialysis, LLC

Lead Case No. 2:18-bk-20151-ER

Jointly administered with:

Case No. 2:18-bk-20162-ER;
Case No. 2:18-bk-20163-ER;
Case No. 2:18-bk-20164-ER;
Case No. 2:18-bk-20165-ER;
Case No. 2:18-bk-20167-ER;
Case No. 2:18-bk-20168-ER;
Case No. 2:18-bk-20169-ER;
Case No. 2:18-bk-20171-ER;
Case No. 2:18-bk-20172-ER;
Case No. 2:18-bk-20173-ER;
Case No. 2:18-bk-20175-ER;
Case No. 2:18-bk-20176-ER;
Case No. 2:18-bk-20178-ER;
Case No. 2:18-bk-20179-ER;
Case No. 2:18-bk-20180-ER;
Case No. 2:18-bk-20181-ER.

Chapter 11 Cases

Adversary No. 20-ap-01575-ER

**STIPULATION FOR DISMISSAL OF
ADVERSARY PROCEEDING**

[Related to Docket No. 1]

ST. VINCENT MEDICAL CENTER, a
California nonprofit public benefit corporation,
SETON MEDICAL CENTER, a California
nonprofit public benefit corporation,
O'CONNOR HOSPITAL, a California nonprofit
public benefit corporation, and SAINT LOUISE
REGIONAL HOSPITAL, a California nonprofit
public benefit corporation,

Plaintiffs,

v.

CALIFORNIA PHYSICIANS' SERVICE dba
BLUE SHIELD OF CALIFORNIA, a California
nonprofit public benefit corporation,

Defendant.

Present Hearing:

Date: [None Scheduled]
Time: [None Scheduled]
Place: Courtroom 1568
255 East Temple Street
Los Angeles, CA 90012

St. Vincent Medical Center, Seton Medical Center, O'Connor Hospital and Saint
Louise Regional Hospital (collectively "Plaintiffs"), and California Physicians' Service dba Blue
Shield of California ("Defendant", and collectively with Plaintiffs, the "Parties,"), having
consummated a settlement of the claims presented in this action, by and through their counsel herein,
pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) made applicable to this adversary
proceeding pursuant to Federal Rules of Bankruptcy Procedure Rule 41, hereby stipulate and agree:

1. That this adversary proceeding be dismissed with prejudice; and
2. That each party shall bear its own costs and expenses incurred herein, including
attorneys' fees.

Dated: June 30, 2023

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Steven J. Kahn

Steven J. Kahn

Gail S. Greenwood

Counsel for St. Vincent Medical Center,
Seton Medical Center, O'Connor Hospital,
and Saint Louise Regional Hospital

[Signature Continued on Next Page]

1 Dated: June 30, 2023

SNELL & WILMER LLP

2
3 /s/ Michael B. Reynolds

4 Michael B. Reynolds

5 Andrew B. Still

6 Counsel for California Physicians' Service

7 dba Blue Shield of California

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
10100 Santa Monica Boulevard, 13th Floor, Los Angeles, California 90067

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION FOR DISMISSAL OF ADVERSARY PROCEEDING** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **June 30, 2023**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Steven J Kahn** skahn@pszyjw.com
- **Michael B Reynolds** mreynolds@swlaw.com, kcollins@swlaw.com
- **Andrew Still** astill@swlaw.com, kcollins@swlaw.com
- **United States Trustee (LA)** ustpregion16.la.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

June 30, 2023
Date

Mary de Leon
Printed Name

/s/ Mary de Leon
Signature